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The application is X granted  
\_\_\_\_\_ denied

A handwritten signature in blue ink, appearing to read 'Edgardo', is written over a horizontal line.

Edgardo Ramos, U.S.D.J.

Dated: April 8, 2022

New York, New York 10007

April 7, 2022

**VIA ECF**

Hon. Edgardo Ramos  
U.S. District Judge  
U.S. District Court for the Southern District of New York  
40 Foley Square, Courtroom 616  
New York, NY 10007

**Re: *Guerrero v. Treasury Wine Estates Americas Company*,  
Civil Action No.: 1:22-cv-00477 (S.D.N.Y.)**

Dear Judge Ramos:

This office represents Defendant Treasury Wine Estates Americas Company ("Defendant") in the above-referenced matter. We write, with the consent of Plaintiff Edelmira Guerrero ("Plaintiff"), to respectfully request a 30-day extension of the deadline for Defendant to respond to the Complaint from April 11, 2022 up to and through May 11, 2022.

By way of background, Plaintiff commenced this action on or about January 19, 2022. (ECF No. 1.) Based on the purported service date of February 18, 2022, Defendant's responsive pleading was due on March 11, 2022. On March 3, 2022, the Court granted Defendant's first request for an extension of its responsive pleading deadline, up to and through April 11, 2022. (ECF No. 7.)

This is the second request for an extension of the responsive pleading deadline. Defendant is requesting this extension of this deadline to provide it with additional time to investigate the allegations in the Complaint, and for the parties to explore a potential non-litigated resolution of this matter. We have communicated with counsel for Plaintiff, and Plaintiff consents to this request.

We respectfully submit this request in good faith and not to cause undue delay. The granting of this application will not impact any other scheduled deadlines. We thank the Court for its time and attention to this matter.



Hon. Edgardo Ramos  
April 7, 2022  
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Respectfully submitted,

SEYFARTH SHAW LLP

*/s/ John W. Egan*

John W. Egan

cc: All counsel of record (via ECF)